

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

INTERROGATORIES OF THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS BOLDT
(APWU/USPS-T1-6-12)
(August 26, 2011)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness James J. Boldt (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness Boldt (APWU/USPS-T1-1-5), filed on August 15, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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APWU/USPS-T1-6 Please refer to your testimony, page 4 lines 13-16 where you state: “For example, alternate retail access channels have proven increasingly popular with postal customers, now accounting for approximately thirty-five percent of retail revenue and trending upward.” Please provide the retail revenue as a percentage of total retail revenue for each alternate retail access channel listed on page 4, lines 1-11 of your testimony.

APWU/USPS-T1-7 Please define “geographically isolated” as you use it on page 11 line 7 of your testimony.

APWU/USPS-T1-8 Please refer to Table 5 on Page 5 of your testimony.

- a) What retail facilities were included as alternatives in Table 5 of your testimony?
- b) What percentage of these alternative retail facilities within the 10 mile circle are postage stamp on consignment retailers?
- c) What percentage of the alternative retail facilities within the 5 mile circle are postage stamp on consignment retailers?
- d) What percentage of alternative retail facilities within the 10 mile circle provides money order services?
- e) What percentage of alternative retail facilities within the 5 mile circle provides money order services?

APWU/USPS-T1-9 Please refer to your response to NAPUS/USPS-T1-11 where you define “customer visits.” Do the number of customer visits as you have defined it factor into the selection of facilities to study for discontinuance?

APWU/USPS-T1-10 Please refer to your response to NAPUS/USPS-T1-40. Are the possible roles that a Post Office may play in a community identified solely through customer input? If not, how else are these roles identified?

APWU/USPS-T1-11 For each location being studied for closure,

- a) Please provide the number of PO Boxes that are provided free of charge because the addressees are not eligible for carrier delivery.
- b) For the locations that contain PO Boxes for people ineligible for carrier delivery, what alternative service will the Postal Service provide to maintain ready access to essential postal services?

APWU/USPS-T1-12 As described in your testimony, there are four different types of locations included on the list for evaluation with vastly different “cut-off” points used to choose the subset of locations to be included in the list for discontinuance study. In the response to DBP/USPS-10-14, it states that the cut-off points used to choose the various locations were chosen to provide a manageable number of locations for the RAO.

- a) Excluding type 4, which is self-explanatory, please describe the process that caused the Postal Service to identify the other three types of locations for this list.
- b) If, as the response to DBP/USPS-10-14 states, the cut-off points were chosen to provide a list of manageable size, how was the total target number of locations determined?
- c) How was it decided what percentage of the target number in b) should be allocated to different types of locations? After all, there is presumably some cut-off point for the Type 1 locations that could have been used that would fill the entire “manageable” number.